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March 31, 2025

VIA ECF

Hon. Arlene Lindsay
U.S. Magistrate Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: ***Newsday LLC v. Nassau County, Nassau County Legislature, and Bruce Blakeman, in his individual capacity, Case No. 2:25-cv-01297-ARL***
Intent to File Motion to Dismiss

Dear Magistrate Judge Lindsay,

We represent Nassau County, Nassau County Legislature, and Bruce Blakeman, in his individual capacity, (“Defendants”) in the above-referenced action. We write pursuant to Section 4 of Administrative Order No. 2023-23 to express our intent to file a Federal Rules of Civil Procedure 12(b)(6) motion to dismiss Plaintiff’s complaint in its entirety for failure to state a claim.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Todd G. Cosenza

Todd G. Cosenza